

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
KATHLEEN MORGAN	:	
	:	
Debtor	:	NO. 18-10316 JKF

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF GEOFFREY SCOTT**

Debtor, by and through Joseph F. Claffy, Esquire, her attorney, contests the Motion for Relief sought by Geoffrey Scott, and in support thereof avers the following:

1. -2. Admitted.
3. Denied as a legal conclusion. Furthermore, there is no basis for relief.
4. Admitted.
3. Mistaken Numbering. Admitted.
4. Mistaken Numbering . Admitted
5. Denied.
6. Admitted. By way of further answer, Debtor, mistakenly failed to list the judgment and will now amend. By way of further answer, the judgment is clearly superfluous in that debtor has no non-exempt assets and her real estate is completely encumbered.
7. Denied. The allegation is a complete misstatement of Pennsylvania Law. Judgments never expire in Pennsylvania. The only consequence of not reviving the judgment is that other judgments may supercede the judgment if it is not revived. Because no judgments can supercede the judgment whilst debtor is in bankruptcy, without court approval, the Motion is moot.
8. Admitted in part; denied in art. Admitted that the relief requested is as stated. Denied that such relief is in any way permitted under the code.
9. Denied as a conclusion of law based upon ultimate fact not in evidence.
10. Admitted.
11. Denied as a conclusion of law.
12. Denied. A review of the claims register reveals that judgment is not attached to any property and is entirely unsecured, in fact it impairs debtor's exemption and will be removed by subsequent motion.
13. Denied. This attempt to gerrymander judgment position is in total dereliction of the code; which should be the sole decider of the judgment's status.
14. Denied that Debtor's residence is not required for her reorganization.

15. Denied as a conclusion of law.

WHEREFORE, Debtor requests the court to deny the relief requested.

Respectfully submitted:

/s/ Joseph F. Claffy  
Joseph F. Claffy  
Attorney for Debtor I.D. No. 35142  
26 South Church Street  
West Chester, PA 19382  
610 429-0900